

# TEXAS AIR CONTROL BOARD

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December 14, 1984

Mr. Robert E. McPherson  
Governor's Planning Director  
Regional Planning/TRACS Section  
Post Office Box 13961, Capitol Station  
Austin, Texas 78711

Subject: Environmental Protection Agency (EPA) Updated  
National Priorities List for Superfund Sites.  
Region 6 EPA Identified as the "Lead Agency" in the  
Study and Cleanup of three New Texas Sites.  
EIS# TX-84-11-10-0022-50

Dear Mr. McPherson:

We are in general agreement with the tasks set forth in the first phase activities which include remedial investigation and a feasibility study by Region 6 EPA for each of the following new Texas sites: (1) in Houston the north Cavalcade Street site and south Cavalcade Street site, and (2) in Texarkana the Koppers Company, Incorporated plant site.

In addition to the first phase activities contained in the document, it should be noted that pursuant to the Texas Clean Air Act, a Texas Air Control Board (TACB) permit (or exemption) must be obtained prior to construction of facilities which may emit air contaminants. Specifically, such requirements could apply to the following or similar type activities or conditions:

1. Cleanup of these sites may result in the construction or the modification of facilities. (TACB permit is required.)
2. Incineration or reclamation is to be investigated as options for disposal of the contaminants. Either of these processes could result in a need for a TACB permit.
3. Injection Well Disposal may also require TACB permits.



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We note from the proposed schedule that First Phase activities are expected to last through August 1986 so there would appear to be ample time to comply with state permitting requirements. If EPA expects that future cleanups may involve tight schedules for which state permitting may pose difficulties, we would hope to work with them ahead of time in the interest of developing procedures that would expedite our review to the extent feasible.

We appreciate the opportunity to review this program. If we can assist further, please contact us.

Sincerely,



Steve Spaw, P.E., Director  
Central Regulatory Operations

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